

[REDACTED]

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**From:** Becky Bonnett [REDACTED]  
**Sent:** 13 June 2019 16:28  
**To:** Planning Policy  
**Subject:** Northampton Local Plan Part 2 Proposed Submission Draft (Regulation 19 Consultation)  
**Attachments:** BPG001\_002\_Site Location Plan with SUE.pdf; BPG005\_001\_Site Location Plan.pdf; Reg 19 Representation - Bastion Group.pdf

Dear Sir/ Madam

On behalf of Bastion Group I attached representations to the Northampton Local Plan Part 2 Proposed Submission Draft (Regulation 19 Consultation). This submission comprises:

1. Representation Form for the Northampton Local Plan Part 2 Proposed Submission Draft (Regulation 19 Consultation);
2. Land at Hardingstone - Site Plan (drawing reference: BPG005/001)
3. Land at Hardingstone, Northampton - Site Location Plan with SUE (drawing reference: BPG001-002)

A hard copy of this submission will follow via post.  
Should you require any additional information please do not hesitate to contact me.

Kind regards

Becky Bonnett





## **REPRESENTATION FORM FOR THE NORTHAMPTON LOCAL PLAN PART 2 PROPOSED SUBMISSION DRAFT (REGULATION 19 CONSULTATION)**

Northampton Borough Council is preparing a Local Plan Part 2 for the Borough which will supplement the West Northamptonshire Joint Core Strategy and will replace Saved Policies in the Northampton Borough Council Local Plan (1997). The Local Plan Part 2 will cover the period to 2029. This stage is the Proposed Submission Draft Local Plan Part 2 (Regulation 19) and is the version of the plan that the Council intends to submit to the Planning Inspectorate for independent examination.

This form should be used to make representations on the Northampton Borough Council Local Plan Part 2 Draft Submission.

You can submit your representation online using our electronic form through the link below:

[www.northampton.gov.uk/lp2proposedsubmission](http://www.northampton.gov.uk/lp2proposedsubmission)

A downloadable version (MS Word) is also available on the same page.

Under the General Data Protection Regulation (GDPR), Northampton Borough Council needs to inform you of the reasons why we are capturing your data and what we will do with your data. Any personal data collected and/or processed will be dealt with in accordance with the Data Protection Legislation and the Council's Data Protection Policy. Data is held securely and accessed by, and disclosed to, only individuals where relevant to this policy / procedure.

View Northampton Borough Council's Privacy Policy here:

<https://www.northampton.gov.uk/info/200031/data-protection/175/data-protection>

Please note that it is not possible for representations to be considered anonymously. Representations will be published on the consultation website and included as part of the submission to the Inspector. Address and contact details will be removed from published responses.

I agree to the Council collecting my personal data so that they can process my reply to the Northampton Local Plan Part 2 Proposed Submission Draft Regulation 19.

☒

Yes (please tick)



**Please complete and submit by 5pm on Friday 14 June 2019.  
Responses received after this time will not be accepted**

Ref:

(For official use only)

This form has 2 parts:

Part A Personal details

Part B Your representation(s).

**Please fill in a separate sheet for each representation you wish to make**

## Part A: Personal Details

**Q1: Are you making this representation as? (Please tick as appropriate)**

- a) Resident or member of the general public ☐
- b) Local Authority or Town/Parish Council ☐
- c) Landowner ☒
- d) Agent / Consultant (on behalf of) ☐
- e) Other organisation (please specify which type of organisation below):

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in column 2.*

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First name	Philip	
Last name	Milne	
Job title (where relevant)	Chief Executive	
Organisation (where relevant)	Bastion Group	
Address line 1		
Line 2		
Line 3		
City / Town		
County		
Postcode		
Telephone number		



Email (if provided we will always contact you this way)		
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## Part B: Representation(s)

**Please use a separate sheet for each representation**

**Please read the accompanying notes before completing Part B.** The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Please note all comments will be made publicly available. If you do not have sufficient space in the box, please continue on a separate sheet or expand the box.

<b>2: Do you consider the Northampton Local Plan Part 2 to be legally compliant?</b>	Yes	✓	No	
If <b>NO</b> , is this because it is: (please tick all that you think apply)				
Not prepared in accordance with the Local Development Scheme				
Not prepared in accordance with the Statement of Community Involvement				
Not consistent with the regulatory requirements for consultation				
Not compliant with the duty to cooperate				
Not accompanied by a compliant Sustainability Appraisal				

**2 (1): Please give details of why you consider the Northampton Local Plan Part 2 Submission Draft document is not legally compliant. Please be as precise as possible.**

<b>3: Do you consider the Northampton Local Plan Part 2 to be sound?</b>	Yes		No	✓
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<b>3 (1): If <b>NO</b>, is this because it is: (please tick all that you think apply)</b>	
Not positively prepared	
Not justified	✓
Not effective	✓
Not consistent with national policy	✓



<b>4: To which part of the Local Plan does this representation relate?</b>	<b>Paragraph number</b>	<b>Policy number</b>	<b>Policies Maps</b>
Housing Delivery	116-126	12	Site Allocations Map

**4 (1): Please set out the changes that you consider are necessary to make the Northampton Local Plan Part 2 Submission Draft document legally compliant and / or sound including revised wording of any policy text, and reasons why the proposed change would make it legally compliant and/or sound. Please be as precise as possible.**

It is considered that the housing delivery is unsound, as the Plan is:

- not justified;
- not effective; and
- inconsistent with the delivery of sustainable development in accordance with the National Planning Policy Framework, 2019 (NPPF).

The reasons for this are set out below.

### **Site Allocations**

In recent years, Northampton's housing land supply has had an over-reliance on large, strategic allocations. Whilst Bastion is not opposed to housing being delivered principally via Sustainable Urban Extensions (SUEs) it should be recognised that the time taken to deliver strategic sites as a generality has been extensively documented<sup>1</sup> and this has been no different in Northampton. Indeed, Paragraph 120 of the Local Plan states that the Council's "*short term housing supply is constrained by the JCS's heavy reliance on large SUEs for substantially meeting the Borough's housing need.*" This has had an impact upon the Council's 5-year housing land supply, the Borough have historically had an undersupply of housing land which in April 2018 was just 2.62 years, this has risen to 4.1 years due to the generous phasing of the Housing Delivery Test which has allowed the Borough to apply a 5% buffer. On this basis, Bastion considers that the Council should seek to make provision for a healthy supply and range of suitable, available and achievable, particularly medium-sized sites (approx. 100 dwellings). Sites of this size can be delivered effectively and efficiently, make a meaningful contribution to the Borough's housing requirements and have the potential to offer a variety of community benefits.

However, the Council has surprisingly chosen to address housing delivery in a rather ad hoc and inconsistent manner by proposing to allocate, for example, *The Green, Great Houghton* for 771 homes, *Quinton Road* along with a collection of very small sites, for example 16 sites are for under 10 dwellings resulting in very little opportunities for community and other benefits. It is our view these smaller sites would be better placed within the "windfall" category and not included as proposed allocations in the Local Plan Part 2, which should identify sites that can make a more significant contribution within the overall spatial strategy for the Borough.

<sup>1</sup> Start to Finish How Quickly do Large-Scale Housing Sites Deliver? November 2016 by NLP



### The Green, Great Houghton

Turning to *The Green, Great Houghton* (site ref: LAA1098) there is no evidence to suggest this site will '*buck the trend*' and be delivered in the Plan period as significant highway infrastructure is required in conjunction with the development of this site. This requirement has been acknowledged within the Council's own evidence base.<sup>2</sup> Other site constraints identified by the Sustainability Appraisal include Grade 2 (Very Good) agricultural land with the southern part of the site located within a sand and gravel safeguarding area. We also note that the Council's Housing Technical Paper Appendix C identifies that this site will start delivering in 2019/20 with the entire site being completed by the end of the Plan period yet, we are not aware that a planning application has yet been submitted for the site, strongly suggesting that there will be a considerable delay in the delivery of this site/development.

In addition, we consider that this site is unsustainable and therefore not consistent with national and existing development plan policies. The site is awkwardly located on the edge of the town in a location which will result in development being heavily reliant on private motor vehicles, this is inconsistent with the sustainable development objectives set out in the NPPF and the West Northamptonshire Joint Core Strategy (WNJCS), including Policies SA and S10.

The inclusion of the site at *The Green, Great Houghton* in the Plan is particularly surprising as it was considered as part of the preparation of the WNJCS, where it was determined that the site was unsustainable and was a disproportionate number of dwellings for Great Houghton to absorb thereby conflicting with the sustainability objectives of the JCS. We also acknowledge that site at *The Green* falls within the Northampton Related Development Area (NRDA) but this does not deem the site as suitable or sustainable and we question what has materially changed since the exclusion of the site from the WNJCS to now make it suitable for proposed allocation as part of the Plan? Whilst the site has been reduced in size and a buffer provided to Great Houghton [which serves to separate the development from the village as an isolated stand-alone community], 771 dwellings is still very large in relation to the existing village, which had a population of just 642 in 2011 (Census), has a Conservation Area and a recent Conservation Area Appraisal (March 2018) that states that the Great Houghton Conservation Area and village has largely retained its character.

It is our view that a site of 771 new homes should be considered as a "strategic-scale" site/development as part of the new West Northamptonshire Strategic Plan – as it was previously and rejected - and not as a proposed allocation in a Part 2 Local Plan.

### Land West of Quinton Road, Northampton

We also note that land west of *Quinton Road, Northampton* (site ref: LAA1007) is proposed to be allocated but do not consider that the selection of the site is "sound" as it is unsustainable and is contrary to the NPPF and the WNJCS which seek to

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<sup>2</sup> Northampton Local Plan Part 2: Site Allocation Methodology and Site Allocation Methodology and Land Availability Assessment (SAMLAA), April 2019



deliver sustainable development. The *Quinton Road* site is isolated on the edge of the town, bound by Wooldale a busy distributor road to the A45. The feeling of isolation is further enhanced by the fact that existing development in the vicinity does not front Wooldale Road. It is our view that isolated development in this location will result in a car-orientated commuter location and with limited integration into the community. It is our view that development of this site will also jeopardise the soft transition from the rural hinterland to the Wootton. To ensure the Plan's distribution and allocation strategy is sustainable and consistent with the NPPF and the existing "parent" development plan, the Plan's approach to the allocation of sites should be amended to prioritise the most sustainable locations otherwise it is unsound in respect of Paragraph 35 of the NPPF.

In light of the above soundness issues, we consider that an alternative, sustainable approach to the allocation of sites for inclusion in the Plan should be pursued, which should consider and include Bastion's land at Hardingstone.

#### The Farm, The Green, Hardingstone

*The Farm, Hardingstone* (site ref: LAA0204) was one of the sites which has been subject to further consideration as part of the Plan but, subsequently discounted with the Council stating that there is "*no evidence that the site is available*" in the SAMLAA and "*no longer available*" in the Sustainability Appraisal for Northampton Local Plan Part 2 (April 2019).

This is difficult to understand as the site has been actively promoted; in addition, it has been promoted as part of a larger site 3.93 ha site suitable for accommodating approximately 100 dwellings. We can confirm that this site is available immediately and is under the control of Bastion who are a local privately-owned residential and commercial property developer with a superb track record in delivering high quality schemes in the area and are fully committed to delivering high quality, sustainable developments. A drawing identifying the extent of the land Bastion control is enclosed with this Regulation 19 submission.

This site is capable of not only providing a cohesive extension to the village but also being a suitable, deliverable and achievable site and development in accordance with guidance provided in the NPPF and Planning Practice Guidance and policies in the WNJCS. It would be a high quality, integrated development in a sustainable location with it being ideally located adjacent to Hardingstone Village, the emerging SUE on land east of Hardingstone (Landimore Road and Newport Pagnell Road, also referred to in the WNJCS as Northampton South of Brackmills) and Brackmills Industrial Estate. These were all instrumental in the Secretary of State allowing an appeal in April 2016 for up to 1,000 dwellings and related development on adjacent land (APP/V2825/A/14/2228866). Bastion's site is within walking distance of existing amenities, schools, employment and frequent bus services. It is worth noting that both Secretary of State and the Inspector saw the SUE's proximity to Brackmills Industrial Estate as a substantial benefit in the sites sustainability credentials and would improve the operation of Brackmills by creating a labour pool.



The site is considered to be unconstrained and off low-quality agricultural land (Grade 3). Due to the site being surrounded by built development the sites viability as part of an agricultural holding has been significantly compromised.

Since taking control of the site, we have taken into consideration the points raised as part of the “Sites Consultation” and the responses are set out below:

### *Capacity*

Since Bastion took control of the land work has started to be undertaken to identify the capacity and the constraints of the site. In relation to capacity, some initial work has been undertaken and it is considered that the site can accommodate up to 100 dwellings

### *Delivery*

These dwellings could be delivered within the 0-5 years period thereby being available now and capable of making an immediate and positive contribution to the Borough’s five-year housing land supply position.

### *Transport*

Whilst the proposed development by Bastion is significantly smaller (just 10%) of the adjacent SUE, a full transport assessment is being commissioned to support promotion through the Local Plan and any planning application. By way of comparison, TRICS data indicates that a development of 101 dwellings on the Bastion land will generate less than 1 movement per minute during the AM and PM peak periods (both arrivals and departures). These movements will also be dispersed as residents travel in different directions from the site to their destinations. This calculation does not factor in the site’s proximity to Brackmills Industrial Estate, one of the town’s largest employment locations. Due to there being no through traffic down Houghton Hill (adjacent to the site) to Brackmills, there is a significant incentive for residents who work there to travel by foot or bicycle.

### *Ecology*

An initial Ecological Survey has been undertaken on the Bastion land. The Ecological Survey identified that the site consists of a large field of species-poor unmanaged grassland, ruderal vegetation and bramble scrub only supporting common species. The hedgerow which lies along the northern boundary is overgrown and species-poor. The hedge on the western boundary supports a wider range of woody species but this is most likely to be of planted origin. A small section of stream along the eastern boundary contains no significant wetland vegetation and is too small to support any significant fauna such as water voles. The modern agricultural barns to the south-west of the site contain no evidence of bat roosting and negligible or no potential to support them. The comments from the North Northants Badger Group, in response to the “Sites Consultation” are noted, however, the Ecological Survey did not find any direct evidence of badgers on the site. Some of the grassland in the main field had been disturbed, so further work



would need to be undertaken to identify whether this was due to badger foraging behaviour or other activities such as dog walkers. The Ecological Survey concludes that loss of the vegetation at the site would have no significant biodiversity impacts.

### *Technical Work*

As part of the Officer response to the “Sites Consultation”, it was identified that further technical work would be required in response to heritage and archaeology. We have sought specialist advice in respect of heritage and it is our view that the main considerations are likely to be:

1. The potential impact on the Grade II Listed Pittam’s Farmhouse and its associated ancillary building which are curtilage listed; and,
2. The potential impact on the setting of the Hardingstone Conservation Area, and the identified important views.

Firstly, Pittam’s Farmhouse and its associated agricultural buildings have been altered in recent years. The barns have now been converted to residential use, with separate accesses. Whilst the former use of the barns is evident, they are now domesticated, with sub-division of the courtyard for rear gardens and parking substantially altering their setting. The mature boundary treatment provides an element of screening between the site and Pittam’s Farmhouse and barns.

The Hardingstone Conservation Area Appraisal sets out a number of key views and vistas. The views from key view 4, which is located at the entrance to the site, is considered noteworthy. This view could be maintained in a number of ways, such as by providing open space or a landscape buffer adjacent to the listed buildings or through the use of differing building heights, with the lower units sited closest to the Conservation Area to help to maintain the views. The most appropriate method would be determined through the detailed design of a scheme.

In relation to archaeology, the County Council Archaeologist responded, stating that there is potential for archaeological remains, but these could be mitigated. On this basis, we have not undertaken any intrusive works to-date and it is our view that archaeology is not significant constraint on the development of the site. The extent of any archaeological works can be agreed with the County Archaeologist prior to any planning application being prepared and submitted.

In summary, the site is deliverable, suitable, available for development and capable of early implementation, which will release additional opportunities for new homes to be built in a sustainable location within Northampton Borough. As such, the site is a suitable site for inclusion as an allocation for development within the Local Plan Part 2.

### ***Housing Trajectory (Table 7)***

Turning to the housing trajectory, Table 7 seeks to amend the housing trajectory set out in the WNJCS. However, we are of the view that this is not effective. The trajectory within WNJCS was prepared to ensure a sustainable balance between housing provision and job delivery. If the trajectory were to be altered residential



completions will be out of kilter with employment growth, which could lead to unsustainable patterns of development. It is our view that a key factor in delivering sustainable development is maintaining a balance between housing and jobs. An imbalance can lead to adverse economic performance, a reduction in the resilience of local businesses, a lack of suitable housing supply and unsustainable commuting patterns.

In addition, we question whether the Council can legitimately amend their housing trajectory in isolation of South Northamptonshire and Daventry due to the NRDA figures being inter-related with others local authorities' housing outputs.

Paragraph 125 states that the annual housing requirements will be stepped up in the latter 5 years, acknowledging that the delivery rates are ambitious, but the matter can be addressed in the West Northamptonshire Strategic Plan, which is timetabled to be completed by 2022. Following this the Council envisage an early review of the Northampton Borough Local Plan Part 2. We do not consider this approach to be effective in the absence of any meaningful start to a review of the WNJCS. This Part 2 Plan cannot ignore such a significant shortfall and cannot rely on an early review.

The trajectory states that from 2024/25 – 2028/29 1,550 dwellings will be delivered per annum. This is an ambitious target when relying on SUEs in close proximity to each other which will be competing with one another and likely to be delivered by the 'big 4' housebuilders, which can restrict the supply. There should be a sufficient range of sites available to enable small-medium developers who will not restrict the delivery rate and to add variety, choice and competition in the market. It is therefore, our view that the strategy is unlikely to prove effective, due to the significant weight placed on strategic sites (SUEs) and the time taken to deliver such sites due to their complexity thereby resulting in significant delay and a lack of supply contrary to the NPPF.

### ***Policies Map***

The Policies Map does not include the sites allocated as part of the WNJCS. We are of the view the map should be update so all the proposed allocations can be seen in the context of the strategic allocations.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested changes, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

## **SUSTAINABILITY APPRAISAL**

**5. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).**

Paragraph	
Comments	



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## **HABITATS REGULATIONS ASSESSMENT**

**6. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number).**

Paragraph	
Comments	

**7: If your representation is seeking a change, do you consider it necessary to take part and speak at the examination hearing(s) if invited to do so by the Inspector?**

<b>No</b> , I do not wish to participate at the oral examination		<b>Yes</b> , I wish to participate at the oral examination	✓
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**8: If you wish to take part at the oral examination, please outline why you consider this to be necessary (please note the Inspector will determine who will be invited to be heard at the examination hearing(s))**

A representative for Bastion should appear at the hearing(s) as we are a local developer with a track record of delivery within Northampton. As such, we are an important stakeholder, understand the local market and are well placed to assist the Inspector in the examination of the Plan.

In addition, Bastion have a sustainable site which is suitable, available, deliverable and achievable and can make an early contribution to Northampton's housing delivery, 5-year housing land supply and achievement of sustainable development objectives.



**9: Please tick a box if you wish to be notified of further progress of the Local Plan Part 2 (please tick all that apply)**

When the Northampton Local Plan Part 2 has been submitted for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (as amended)	✓
When the report of any person appointed to carry out an independent examination of Northampton Local Plan Part 2 is published	✓
When the Northampton Local Plan Part 2 has been adopted	✓
Other (please specify)	

<b>10: Signature</b>	Philip Milne	<b>Date</b>	13/06/2019
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**Thank you for taking the time to complete the form.  
Please return it to:**

**Email:**

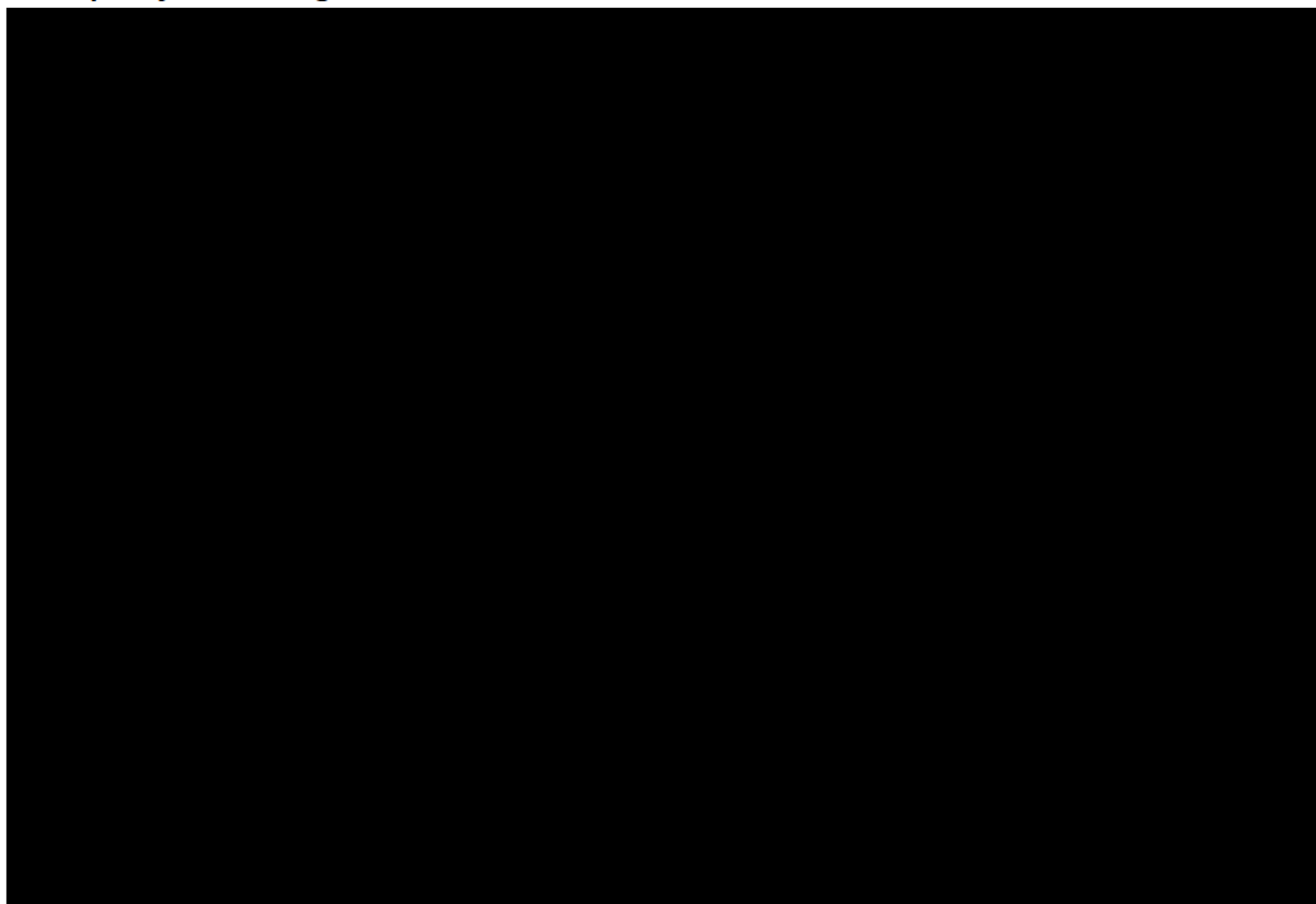
[Redacted email address]

By **post** or by **hand** to:

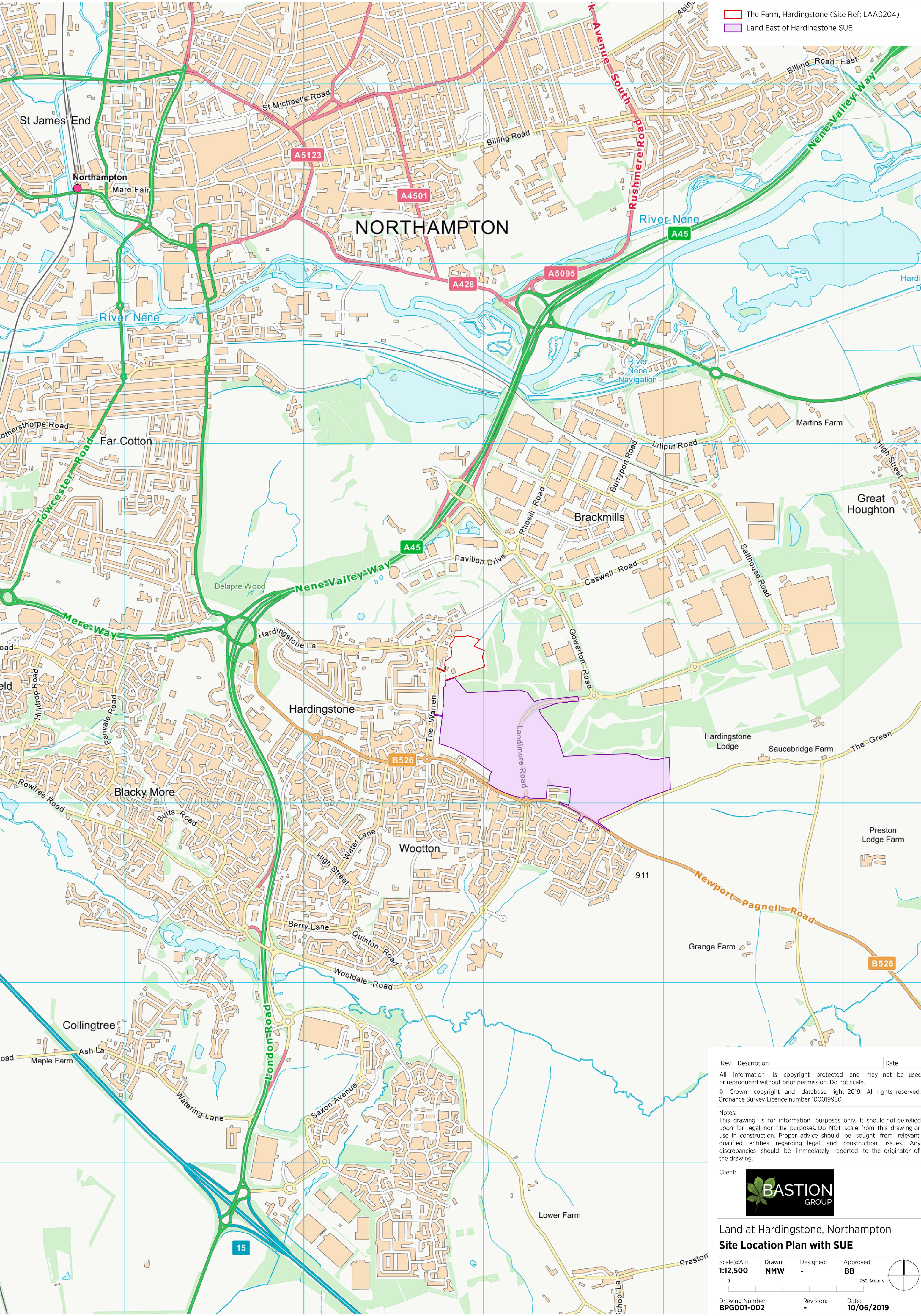
Northampton Borough Council

Planning Policy, The Guildhall, St Giles Square, Northampton, NN1 1DE

**Equality Monitoring Form**







Rev	Description	Date
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**Notes:**  
This drawing is for information purposes only. It should not be relied upon for legal nor title purposes. Do NOT scale from this drawing or use in construction. Proper advice should be sought from relevant qualified entities regarding legal and construction issues. Any discrepancies should be immediately reported to the originator of the drawing.

Client:

Land at Hardingstone, Northampton  
**Site Location Plan with SUE**

Scale@A2: <b>1:12,500</b>	Drawn: <b>NMW</b>	Designed: <b>-</b>	Approved: <b>BB</b>
<div><div></div><div>0750 Meters</div></div>			

Drawing Number: <b>BPG001-002</b>	Revision: <b>-</b>	Date: <b>10/06/2019</b>
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Land at Hardingstone

**Site Plan**

Scale@ A3 : 1:2,500 Drawn: ADW Designed: BB Approved: ---

0m 100m

Drawing Number: BPG005/001 Revision: --- Date: 12.12.18



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